

Exhibit X

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO
ENTERO, et al.,

Plaintiffs,

v.

GREGORY W. ABBOTT, et al.,

Defendants.

Civ. Act. No. 5:21-cv-844
(XR)
(consolidated cases)

DECLARATION OF TERI SALTZMAN

My name is Teri Saltzman. I am over the age of 21 and fully competent to make this declaration. Under penalty of perjury, I declare the following based on my personal knowledge:

1. I am a 59-year-old woman who currently lives in Travis County, Texas. I have been mostly voting by mail since 1985. I voted for the first time in Texas in 1985. In 2000, I

moved to Florida and was a registered voter there. I moved to North Carolina in 2011 and was a registered voter there. Since 2014, I have been living and voting in Texas.

2. I am a member of The Arc of Texas and REVUP-Texas. I routinely receive informational emails from both organizations.

3. I vote by mail because I am legally blind. I am substantially limited in the major life activity of seeing. Being independent is important to me. I use a screen magnifier to assist my vision. I prefer to vote by mail because I have voted in person before and found it difficult due to my disability. Voting sites don't always have the machines working that make voting accessible to me. For example, I have tried to vote in person before and there were headphones missing from the accessible voting machine. The volunteers at the voting sites are helpful, but they don't always know how to

work or fix the machines so that I can vote. In addition, I do not drive due to my disability, so voting in person would require me to find transportation.

4. Prior to SB 1, I voted by mail in Texas several times and never had any problems.
5. In January 2022, I requested a mail-in ballot online at vote.org. I received a ballot request form, completed the form, and submitted the form within a week.
6. About a week later, my request for a mail-in ballot on the basis of my disability was denied. I was given two reasons for its denial. First, I received a letter stating that my request for a mail-in ballot had been denied because my driver's license number, Social Security number, or voter ID number were incorrect. However, I had entered all three numbers correctly. I verified these numbers were correct with a Training and Technical Support Specialist at Disability

Rights Texas. Second, an employee at the Elections Office told me the reason that my request for a mail-in ballot was denied was because the application I was sent was out of date. She stated that the Elections Office had changed forms in January. However, I requested my mail-in ballot application in January, so I should have been sent the up-to-date form.

7. The Elections Office employee directed me to go to the Texas Secretary of State Ballot by Mail Tracker at www.votetexas.gov to re-enter my information, but I was unsuccessful after several tries. The website was not accessible for blind users and was difficult to view with my screen magnifier. The website also seemed to be having technical issues. DRTX communicated with the Travis County Department of Elections on my behalf and obtained

an accessible document for me. I completed that document, submitted it, and thought I cured the issue.

8. In February 2022, I received my mail-in ballot, completed the ballot, and mailed the ballot before the deadline.

9. On March 4, 2022, less than a week before the deadline, I received a letter from Travis County Elections stating that my mail-in ballot was rejected. This Notice of Carrier Defect email stated that my Carrier Envelope was received and reviewed, but defective. The box was checked on the Notice that my carrier envelope did not contain my Texas Driver's License Number, Texas Personal Identification Number, Texas Election Identification Certificate Number or the last 4 digits of my Social Security Number; or that the number I provided did not match the number associated with my voter registration record as provided by my County's Voter Registrar. I contacted the Travis County Election Office to

clarify and was told that I did not provide my ID numbers under the envelope flap before I sealed and signed the envelope. Due to my disability, I did not see anything on the envelope flap when I received it. I had never heard of this requirement and did not receive any instructions regarding the envelope flap in my March ballot election envelope. I was once again directed to go to the Texas Secretary of State Ballot by Mail Tracker at www.votetexas.gov to attempt to cure, or to cancel my ballot. I attempted to cure through the Ballot by Mail Tracker and was unsuccessful. The website was still inaccessible even when I used my screen magnifier and seemed to be having technical issues.

10. I contacted Travis County's Election Office by phone four times to attempt to successfully cure my ballot through the State Ballot by Mail Tracker, and each person I spoke to suggested a different solution. I was told that it was possible

I was entering too much information and to attempt again, leaving out information. For example, my street address has “Avenue” in it, and I was told to leave “Avenue” out of my address. This did not work. Another person from the Travis County Election Office asked me if I knew about large print software and screen readers, which was frustrating to me because, as a legally blind person, I am very aware of this technology. I already use a screen magnifier. Finally, another person asked me if I could go down to their office and drop my ballot off, or if I could ask anyone to drive me there. This suggestion was frustrating as well, as I vote by mail due to my disability and to be independent. I did not feel I should be required to find and obtain transportation to fix the issue as this would defeat the purpose of voting by mail. After ample time on the phone, the website finally worked when I clicked the button and cured the ballot. I

called the Travis County Election Office to verify, and they confirmed my ballot was cured.

11. At no time did I see or was I offered any information on my rights as a person with a disability, and the availability of reasonable modifications or accommodations under federal or state laws. At no time did I see or was I offered contact information for who could help me with reasonable modification or accommodations, or information as to what the grievance procedure would be if I was initially refused. This information was not available on the website, on anything that was mailed to me, or from any of the many people I spoke with.

12. Approximately a week later, I received another letter, which was not in an accessible format for me because it was not in large print, stating that there were errors in my ballot, so therefore my ballot didn't count. I am unsure if this letter

was a copy from the week prior or if it was a new letter. I am now unsure if my vote was counted.

13. In May 2022, I tried voting curbside rather than voting by mail during the primary runoff. A volunteer came outside with a laptop, but it was inaccessible, and they had no headphones. Because of this, the volunteer had to read the screen for me and I had no choice but to tell them my choices out loud. My vote was not private as the election volunteer heard my choices.

14. In addition to the difficulties and barriers with voting in person described above, I cannot drive myself to the polling place, and paratransit is not available where I live in Pflugerville. While my husband does drive, he is not always available to drive me when the polls are open.


15. I tried voting by mail again in November 2022. My optic device magnifies print to the eighth power, and yet the

font on the mail-in-ballot envelope flap is still too small for it to be readable for me. In November 2022, the font was even smaller because there was even more text on the envelope flap. My mail in ballot was rejected yet again for an ID-related reason, and I was again unable to cure the problem online because it again said that I was not a registered voter.

16. SB 1 is making it harder for people with disabilities like me to vote. I registered to vote by mail based on my disability and I have always done this successfully in the past, but this option is no longer accessible to me due to all of the new ID requirements and burdens imposed by SB 1 on the voting by mail process. I tried so hard to vote in the March primary, but at every turn, I faced obstacles due to my disability. I am very concerned about my ability to vote in the future due to SB 1.

This Declaration is made pursuant to 28 U.S.C. § 1746. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this ___ day of May, 2023, at Austin, Texas.


Teri Salzman